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February 17, 2023

VIA E-FILING

Honorable Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 1060104150

Re: Kaminsky-Stemerman, et al v. Bankers Standard Insurance Company, et al
No.: 7:22-CV-02685-KMK

Dear Honorable Karas,

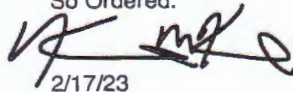
I write on behalf of plaintiff in the above action, with defendant's consent, to respectfully request a 60-day extension of applicable discovery deadlines.

The parties have substantially completed paper discovery and both plaintiffs were deposed on January 18. The parties are working to schedule depositions of defendant's representative and a non-party witness. The current schedule requires fact discovery to be complete by March 7. Due to scheduling issues, we are not able to schedule these depositions before that deadline. We are looking to schedule both depositions in March, but in order to avoid burdening the Court with multiple extension requests, ask for a 60-day extension at this time. Additionally, plaintiff has made a settlement demand, which the defendant is evaluating, and the parties are hopeful that they may have meaningful settlement discussions over the next 30-60 days.

I thank you for your attention to this matter and am available to answer any questions the Court may have.

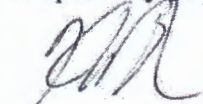
Granted, but there will be no further such extensions. The case management conference is moved to 5/ 11 /23, at 11:30. The pre-motion letter deadlines are moved accordingly.

So Ordered.


2/17/23

KWS/jlw

Respectfully yours,



Kelsey W. Shannon

cc: Robert S. Goodman, Esq.
Matthew Horowitz, Esq.
Mound Cotton Wollan & Greengrass LLP
(via e-filing)